

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JONATHAN GREEN

Plaintiff

v.

CITY OF BOSTON; EDWARD DAVIS, in his
capacity as CHIEF OF THE BOSTON POLICE
DEPT; TIMOTHY MCCARTHY, individually
and in his official capacity as an Employee,
Agent, and/or Officer of the BOSTON POLICE
DEPARTMENT

Defendants.

CIVIL ACTION NO.
09-11705-NG

**PLAINTIFF, JONATHAN GREEN'S AUTOMATIC DISCLOSURES TO THE DEFENDANTS
PURSUANT TO LOCAL RULES 26.2 (A) AND 26.1 (B)**

Pursuant to Fed.R.Civ.P. 26(a)(1) and local Rule 26.2(A), Plaintiff, Jonathan Green submits this initial discovery disclosure. This disclosure is based on information currently known to Plaintiff. In accordance with Rule 26(a), Plaintiff submits that the information below is or may be relevant to his cause(s) of action. In making this disclosure, Plaintiff preserves all rights with respect to the information being produced, including, but not limited to, the right to object to the admission into evidence at trial of any information. Plaintiff reserves the right to supplement this disclosure as provided by F.R.Civ.P. 26(e).

A. The name and, if known, the addresses and telephone numbers of each individual likely to have discoverable information that the disclosing party may use to support its claims, or defenses, unless solely for impeachment, identifying the subjects of the information.

Mrs. Juste Hyacinth
D.O.B.: Unknown
70 St. Botolph Street, Apt. 216
Boston, MA 02116

Mr. Douglas Hanson
206 Minot Street
Dorchester, MA 02122

Sgt. Marcus Eddings
Boston Police Department
Internal Affairs Division
1 Schroeder Plaza
Boston, MA

Officer Stephen Sacilotto
Boston Police Department

Officer Melody Nash
Boston Police Department

Sgt. Marwan Moss
Boston Police Department
Internal Affairs Division
1 Schroeder Plaza
Boston, MA

Officer Timothy McCarthy
Boston Police Department

Disclosure:

Plaintiff states that the following persons are likely to have the discoverable information that they may use to support their claims. In identifying the following individuals, Plaintiff does not hereby waive the attorney-client privilege or any of his rights under the attorney work product privilege.

Plaintiff incorporates by reference the disclosure of individuals likely to have discoverable information made by the defendants, named in the above-captioned complaint.

- B. A copy of or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Disclosure:

Plaintiff discloses photographs and medical records in his possession. Plaintiff also represents that he has the actual shirt worn by Mr. Jonathan Green at the time of the incident. Inspection of said materials is available by appointment with counsel for the Plaintiff.

- C. A computation of any category of damages by the disclosing party, making available for inspection and copying as under Rule 34 the documents and other evidentiary material, not privileged or protected from disclosure, on which said computation is based, including materials bearing on the nature and extent of injuries suffered.**

Disclosure:

Plaintiff has not made a computation of any damages as of yet. Plaintiff realizes his obligation to supplement discovery under the Federal Rules of Civil Procedure.

- D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Disclosure:

Plaintiff hereby states that there are no insurance agreements which may be used to satisfy, indemnify or reimburse for payments made to satisfy judgment.

JONATHAN GREEN,
By his attorney

/s/Gordon W. Spencer Esq.,
BBO# 630488
945 Concord Street
Framingham, MA 01701
(508) 231-4822

CERTIFICATE OF SERVICE

I, Gordon W. Spencer, hereby certify that I have served a true copy of the above document upon the attorney of record for each other party via mail and electronic transmission on August 29, 2010.

Gordon W. Spencer